Serial No.: 09/988,617 Docket No.: 107156-00080

## **Remarks**

Reconsideration of the above-captioned patent application is respectfully requested in view of the following remarks.

The Examiner rejected claims 2, 4, 5, 7, and 9-14 under 35 U.S.C. § 102(b), as allegedly being anticipated by U.S. Patent No. 5,434,591 to Goto *et al.* ("Goto"). Applicant respectfully traverses the Examiner's rejection, as follows.

Applicant's independent claim 12 describes a method of displaying an image comprising the steps of "classifying vector data, indicating a plurality of points for displaying the image, into a group of data comprising indispensable points, wherein a number of the plurality of points included in the indispensable points is substantially equal to a minimum number of the plurality of points required to recognize the image, . . . wherein the image is represented only by the data group comprising the indispensable points when being scrolled on a screen." Similarly, Applicant's independent claim 13 describes a system for displaying an image comprising "a data storage member for classifying vector data, indicating a plurality of points for representing the image, into a data group comprising indispensable points, wherein a number of the plurality of points included in the indispensable points is substantially equal to a minimum number of the plurality of points required to recognize the image, . . . wherein said image quality selection member selects the image display represented only by the data group comprising the indispensable points when the image is scrolled on a screen." Moreover, Applicant's independent claim 14 describes a system which includes limitations that are similar to the above-described limitations of

TECH/286170.1 -2-

Serial No.: 09/988,617

Docket No.: 107156-00080

independent claim 13. Thus, in Applicant's claimed invention, during scrolling of an

image through a screen, only those points which are required for minimal

recognition of the image are used to represent the image.

In contrast, Goto describes a system for displaying graphic data in which "a

characteristic of the data is altered, according to the speed of the scrolling, to facilitate

the viewing of the data as the data is scrolled". Goto, Abstract, Lines 2-4. Specifically.

"a selected part of the data is omitted from the display during scrolling so that a reduced

amount of data is displayed, the amount of reduction in displayed data being

proportional to the scrolling period." Id. at Lines 5-8 Because the amount of graphic

data displayed changes during scrolling based on the scrolling period, the image

displaying system described in Goto does not display only the minimum number of

points which are required to recognize the image.

However, in the Office Action, the Examiner asserts that Figure 6 of Goto depicts

items 51-53, and items 51-53 show indispensable and supplemental data points where

the indispensable points 51 are a constant set of data. See, e.g., Office Action, Page 9,

Lines 4-7. For the reasons set forth below, Applicants respectfully submits that item 51

of Goto does not correspond to Applicant's claimed "indispensable points," as set forth

in independent claims 12-14.

Specifically, with respect to items 51-53, Goto states that item 51 corresponds to

"road information," item 52 corresponds to "house information," and item 53

corresponds to "owner information." When a user is not engaging in a scrolling

operation, items 51-53 are displayed on the screen, i.e., the image comprises items

Serial No.: 09/988,617

Docket No.: 107156-00080

51-53. However, when the user engages in a scrolling operation, item 51 remains displayed on the screen, and items 52 and 53 are masked, such that only item 51 is displayed on the screen during scrolling. See, e.g., Goto, Column 5, Lines 4-42. As such, during a scrolling operation, data is removed from the screen based on the content of the data or the type of data, e.g., road information remains displayed on the screen while house and ownership information is removed from the screen.

Nevertheless, this removal of data from the screen based on the content of the data or the type of the data does not correspond to Applicant's claimed "indispensable points." Specifically, in Applicant's claimed invention, if the image comprised items 51-53 when the user is not engaging in a scrolling operation, then during a scrolling operation, the image would comprise the indispensable points associated with item 51, the indispensable points associated with item 52, and the indispensable points associated with item 53, i.e., the image only would comprise the indispensable points associated with the entire image. However, in Goto, all of the data points associated with each of items 52 and 53 are removed from the screen during the scrolling operation, and all of the data points associated with item 51 remain displayed on the screen during the scrolling operation. Because all of the data points associated with item 51 (road information) are displayed on the screen during the scrolling operation, some of the data points displayed on the screen during the scrolling operation are not indispensable points. Specifically, item 51 still would be recognizable if some of the data points associated with item 51 that are displayed during the scrolling operation were removed from the screen during the scrolling

TECH/286170.1 -4-

Serial No.: 09/988,617

Docket No.: 107156-00080

operation. Moreover, because all of the data points associated with item 52 (housing

information) and all of the data points associated with item 53 (ownership information)

are removed the screen during the scrolling operation, the indispensable points

associated with item 52 and the indispensable points associated with item 53 are

removed from the screen when the scrolling operation occurs. In sum, Goto merely

describes removing entire portions of the image during the scrolling operation based on

the content of the data. Therefore, Applicants respectfully requests that the Examiner

withdraw the rejection of independent claims 12-14.

Claims 2, 4, 5, 7, and 9-11 depend from allowable independent claims 12 and 13,

respectively. Therefore, Applicant respectfully requests that the Examiner also

withdraw the rejection of claims 2, 4, 5, 7, and 9-11.

Serial No.: 09/988,617

Docket No.: 107156-00080

## CONCLUSION

Applicant respectfully submits that the above-captioned patent application is in condition for allowance, and such action is earnestly requested. If the Examiner believes that an in-person or telephonic interview with Applicant's representatives would expedite the prosecution of the above-captioned patent application, the Examiner is invited to contact the undersigned attorney of records. Applicant believes that no fees are due as a result of this submission. Nevertheless, in the event of any variance between the fees determined by Applicant and those determined by the U.S. Patent and Trademark Office, please charge any such variance to the undersigned's Deposit Account No. 01-2300.

Respectfully submitted

Timothy J. Churna

Attorney for Applicant

Registration No. 48,340

Customer No. **004372**ARENT FOX, PLLC
1050 Connecticut Avenue, N.W., Suite 400
Washington, D.C. 20036-5339

Tel: (202) 857-6000 Fax: (202) 638-4810

GEO/TJC:klf